

# **Exhibit 4**



with outside counsel (*i.e.*, Labaton Sucharow LLP and Hahn Loeser & Parks LLP) and OPERS employees.

OPERS Endorses Approval of the Settlement by the Court

4. Since OPERS' appointment as Lead Plaintiff, the System has been closely involved in the prosecution of this case and the eventual settlement with respect to defendant AIG and the related defendants. I have regularly communicated with outside counsel, from initiation of the action to the present, through telephone calls, written correspondence and electronic mail, and in-person meetings in Columbus, Ohio. Outside counsel consulted frequently with me concerning litigation strategy (such as decisions relating to amending the operative complaints, motion practice, discovery issues, mediation and settlement) and kept me well-informed about the progress and status of this case. In addition, I have consulted regularly with the Ohio Attorney General's office regarding this litigation.

5. Based on the System's involvement throughout the prosecution and resolution of the claims against AIG, it believes that the proposed Settlement is fair, reasonable and adequate to the Settlement Class. OPERS believes that the proposed Settlement represents a substantial recovery for the Settlement Class, particularly in light of the substantial risks of continued litigation in this case. Therefore, the System strongly endorses approval of the Settlement by the Court.

OPERS' Request for Reimbursement

6. I have spent a total of at least 178 hours representing the class in this case to date. This time was spent: consulting and strategizing with outside counsel via telephone, electronic mail and in-person meetings; reviewing pleadings, motion papers and other court documents filed on behalf of Lead Plaintiff (including drafts), and documents filed on behalf of defendants;

reviewing correspondence between outside counsel and counsel for defendants; reviewing correspondence to the Court from outside counsel and counsel for defendants; and reviewing and responding to defendants' discovery requests. During this time, I was unable to perform my regular duties on behalf of OPERS.

7. Considering my annual salary, benefits and related administrative overhead, and in view of the number of hours I work on an annual basis, I estimate that the cost to the System for my services is approximately \$175 per hour. The cost to the System for the 178 hours I performed on the litigation generally totals \$31,150.00.

8. Mark Gleaves is Associate Counsel at OPERS. For a period of roughly three months in 2006 while I was on maternity leave, Mr. Gleaves was the OPERS liaison with outside counsel regarding the prosecution of this litigation. In that capacity, Mr. Gleaves spent at least 12 hours doing so. During that time, he was unable to perform his regular duties on behalf of the System.

9. Considering Mr. Gleaves' annual salary, benefits and related administrative overhead, and in view of the number of hours he works on an annual basis, I estimate that the cost to the System for his services is approximately \$150 per hour. The cost to the System for the 12 hours he performed on the litigation generally totals \$1,800.00.

10. OPERS employees within the System's investment and related departments (including John Blue, Robert Ball, Anthony Enderle, Susan Sommerfeld, Timothy Steitz, Scott Murray, Timothy Swingle, Jim Wright, Dan Sarver, Alan Davidson, Walter Knox and Jerry May) spent at least 130 hours assisting the prosecution of this case, including searching for relevant documents for production, communicating with me and outside counsel regarding the litigation, meeting with other OPERS employees regarding the System's investments in AIG,

meeting with counsel to prepare for depositions, and providing testimony at depositions. During that time, these employees were unable to perform their regular duties on behalf of the System.

11. Considering these employees' annual salaries, benefits and related administrative overhead, and in view of the number of hours they work on an annual basis, we estimate that the cost to the System for their services is approximately \$175 per hour. Thus, the cost to OPERS for the hours its investment personnel spent assisting the prosecution of this case totals \$22,750.00.

12. OPERS employees within the System's IT department (including Peggy Trump, Kevin Arnold, Lisa Castricone and Mateka Garrison) spent at least 53 hours assisting the prosecution of this case, including searching for relevant electronic documents for production, communicating with me and outside counsel regarding the litigation, meeting with other OPERS employees regarding the System's document retention policies, meeting with counsel to prepare for depositions, and providing testimony at depositions. During that time, these employees were unable to perform their regular duties on behalf of the System.

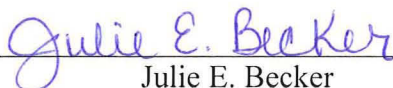
13. Considering these employees' annual salaries, benefits and related administrative overhead, and in view of the number of hours they work on an annual basis, we estimate that the cost to the System for their services is approximately \$65 per hour. Thus, the cost to OPERS for the hours the System's IT personnel spent assisting the prosecution of this case totals \$3,445.00.

14. The total cost to OPERS for the hours of all the System's employees (legal, investment and IT) on the matters pertaining to the litigation to date totals \$59,145.00.

15. OPERS has already been reimbursed \$16,144.00 by the Court for its wages incurred in connection with the claims against settled defendant PricewaterhouseCoopers LLP. (D.E. #570).

16. In connection with the proposed settlement with AIG, I respectfully request that OPERS be awarded \$36,551.00 for wages of its employees related to the System's representation of the Settlement Class as Lead Plaintiff with respect to the claims against AIG.

I declare under penalty of perjury that the foregoing is true and correct, within the limits of my knowledge. Executed this 29<sup>th</sup> day of November 2011.

  
Julie E. Becker